

Congress of the United States

Washington, DC 20510

March 27, 2014

280

The Honorable Tom Wheeler
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

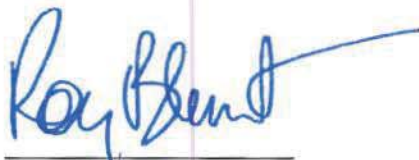
Dear Chairman Wheeler:

We write to express our concerns regarding the Federal Communications Commission's (FCC) plan to vote during its March 2014 meeting on a proposed rule change concerning attribution of joint sales agreements (JSAs) and other arrangements between TV station owners.

In small- and medium-sized markets, JSAs and other financial agreements between local TV broadcasters to share facilities have a track record for expanding the diversity and localism of programming, and enabling efficiencies that have saved lives. In Missouri, we have seen the benefits of these arrangements in Springfield and Joplin. In 2006, through a series of arrangements, the parent company of a local station was able to invest, reduce redundant costs, and expand advertising sales for its smaller competitor. As a result, a once struggling station has improved tremendously and was the recent recipient of a National Edward R. Murrow Award for Best Newscast. Additionally, in Joplin, a JSA arrangement between two stations provided the economic efficiencies that enabled upgrades to the stations' Doppler radar systems, which helped save lives when a devastating tornado hit Joplin in May 2011. Lastly, JSAs add to diversity across the country by expanding Spanish-language local programming, and, significantly, the only three stations owned by African Americans operate through joint sales agreements.

We fully expect existing agreements in Missouri already approved by the FCC to be properly grandfathered by any prospective rules. Moreover, we expect that arrangements currently awaiting approval under existing rules should be examined in light of the rules when the application was made. Finally, we believe the process for considering changes to the rules should be made in the context of the Commission's larger media ownership proceeding.

We strongly urge the Commission to be mindful of the harmful consequences that a rules change on JSAs, outside the context of a broader media ownership review, may have on diversity, localism, competition, and lives.




Roy Blunt
U.S. Senator

Sincerely,



William Lacy Clay
U.S. Representative



Ann Wagner
U.S. Representative



Blaine Luetkemeyer
U.S. Representative



Vicky Hartzler
U.S. Representative




Emanuel Cleaver II
U.S. Representative



Sam Graves
U.S. Representative



Billy Long
U.S. Representative



Jason Smith
U.S. Representative



OFFICE OF
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

May 1, 2014

The Honorable Roy Blunt
United States Senate
260 Russell Senate Office Building
Washington, D.C. 20510

Dear Senator Blunt:

Thank you for your letters expressing concerns regarding the recent Commission action to attribute certain Joint Sales Agreements (JSAs) between television stations. I appreciate the opportunity to provide some clarification about the Commission's March 31, 2014 decision to attribute TV JSAs where one station sells 15% or more of the weekly advertising time on behalf of another station in the same market.

The Commission is taking a comprehensive review of the broadcast ownership rules as part of our recently adopted Further Notice of Proposed Rulemaking that started the 2014 Quadrennial Review. Even in light of the pending proceeding, it is important that the Commission continues to enforce its existing rules. Historically, the Commission's rules have prohibited one television broadcaster from owning more than one station in small and medium-size markets. The purpose of this is to foster competition, localism, and a diversity of voices in the public interest. There has been a growing concern over the last decade that TV stations are using JSAs as a way to circumvent our local TV ownership restrictions, by influencing the core operating functions of the other station in a market where joint ownership would not be allowed under the rules. Stations have been on notice since 2004 when the Commission first started a proceeding proposing to attribute these types of TV agreements. Since the start, the industry has participated in the proceeding, including in 2010 when the Commission sought additional comment as part of the Quadrennial Review of broadcast ownership rules.

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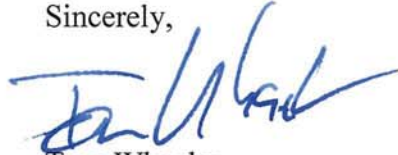
Additionally, while some that believe attribution of JSAs will hurt diversity of ownership and programming, dozens of minority groups, scholars, and public interest organizations have publicly supported the Commission action. Such agreements stifle competition and can have the effect of eliminating opportunities for minority or women-owned entities.

Page 2—The Honorable Roy Blunt

By moving decisions on broadcast ownership into the open, we will enable the public and the Commission to consider more fully and appropriately the public interest issues raised by the implementation of the Commission's rules.

I hope this information is helpful.

Sincerely,



Tom Wheeler



FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

OFFICE OF
THE CHAIRMAN

May 1, 2014

The Honorable William Lacy Clay
U.S. House of Representatives
2418 Rayburn House Office Building
Washington, D.C. 20515

Dear Congressman Clay:

Thank you for your letter expressing concerns regarding the recent Commission action to attribute certain Joint Sales Agreements (JSAs) between television stations. I appreciate the opportunity to provide some clarification about the Commission's March 31, 2014 decision to attribute TV JSAs where one station sells 15% or more of the weekly advertising time on behalf of another station in the same market.

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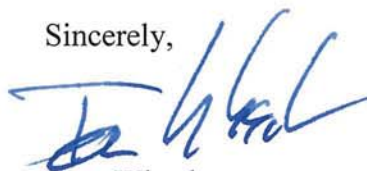
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Sincerely,

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Tom Wheeler



OFFICE OF
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

May 1, 2014

The Honorable Emanuel Cleaver
U.S. House of Representatives
2335 Rayburn House Office Building
Washington, D.C. 20515

Dear Congressman Cleaver:

Thank you for your letter expressing concerns regarding the recent Commission action to attribute certain Joint Sales Agreements (JSAs) between television stations. I appreciate the opportunity to provide some clarification about the Commission's March 31, 2014 decision to attribute TV JSAs where one station sells 15% or more of the weekly advertising time on behalf of another station in the same market.

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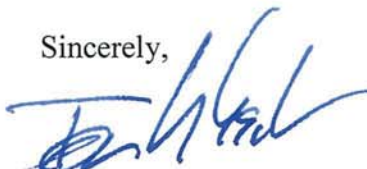
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Tom Wheeler



OFFICE OF
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

May 1, 2014

The Honorable Sam Graves
U.S. House of Representatives
1415 Longworth House Office Building
Washington, D.C. 20515

Dear Congressman Graves:

Thank you for your letter expressing concerns regarding the recent Commission action to attribute certain Joint Sales Agreements (JSAs) between television stations. I appreciate the opportunity to provide some clarification about the Commission's March 31, 2014 decision to attribute TV JSAs where one station sells 15% or more of the weekly advertising time on behalf of another station in the same market.

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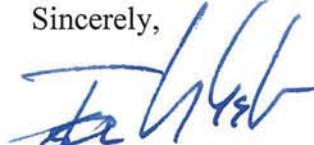
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Tom Wheeler



FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

OFFICE OF
THE CHAIRMAN

May 1, 2014

The Honorable Vicky Hartzler
U.S. House of Representatives
1023 Longworth House Office Building
Washington, D.C. 20515

Dear Congresswoman Hartzler:

Thank you for your letter expressing concerns regarding the recent Commission action to attribute certain Joint Sales Agreements (JSAs) between television stations. I appreciate the opportunity to provide some clarification about the Commission's March 31, 2014 decision to attribute TV JSAs where one station sells 15% or more of the weekly advertising time on behalf of another station in the same market.

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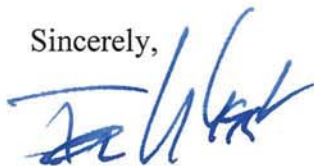
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Tom Wheeler



OFFICE OF
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

May 1, 2014

The Honorable Billy Long
U.S. House of Representatives
1541 Longworth House Office Building
Washington, D.C. 20515

Dear Congressman Long:

Thank you for your letter expressing concerns regarding the recent Commission action to attribute certain Joint Sales Agreements (JSAs) between television stations. I appreciate the opportunity to provide some clarification about the Commission's March 31, 2014 decision to attribute TV JSAs where one station sells 15% or more of the weekly advertising time on behalf of another station in the same market.

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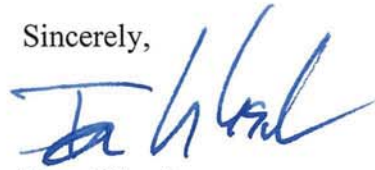
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Tom Wheeler



OFFICE OF
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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

May 1, 2014

The Honorable Blaine Luetkemeyer
U.S. House of Representatives
2440 Rayburn House Office Building
Washington, D.C. 20515

Dear Congressman Luetkemeyer:

Thank you for your letter expressing concerns regarding the recent Commission action to attribute certain Joint Sales Agreements (JSAs) between television stations. I appreciate the opportunity to provide some clarification about the Commission's March 31, 2014 decision to attribute TV JSAs where one station sells 15% or more of the weekly advertising time on behalf of another station in the same market.

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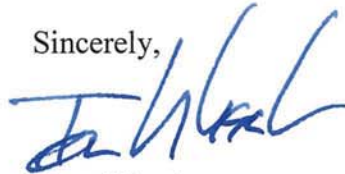
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May 1, 2014

The Honorable Jason Smith
U.S. House of Representatives
2230 Rayburn House Office Building
Washington, D.C. 20515

Dear Congressman Smith:

Thank you for your letter expressing concerns regarding the recent Commission action to attribute certain Joint Sales Agreements (JSAs) between television stations. I appreciate the opportunity to provide some clarification about the Commission's March 31, 2014 decision to attribute TV JSAs where one station sells 15% or more of the weekly advertising time on behalf of another station in the same market.

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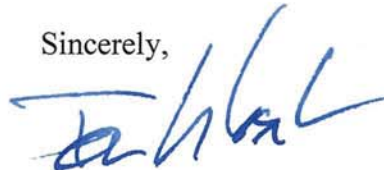
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Page 2—The Honorable Jason Smith

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OFFICE OF
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

May 1, 2014

The Honorable Ann Wagner
U.S. House of Representatives
435 Cannon House Office Building
Washington, D.C. 20515

Dear Congresswoman Wagner:

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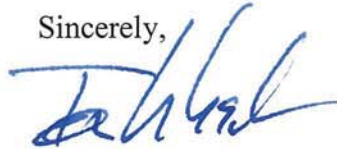
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